

**TECHNICAL REVIEW DOCUMENT**  
**For**  
**Minor Modification to**  
**OPERATING PERMIT 95OPBO082**  
to be issued to:

CEMEX, Inc.  
Lyons Cement Plant  
Boulder County  
Source ID 0130003

Prepared by Cathy Rhodes  
August, 2002

**I. PURPOSE:**

This document establishes the basis for decisions made regarding the Applicable Requirements, Emission Factors, Monitoring Plan and Compliance Status of Emission Units covered within the Operating Permit proposed for this site. It is designed for reference during review of the proposed permit by the EPA and during Public Comment. This narrative is intended only as an adjunct for the reviewer and has no legal standing. Conclusions in this document are based on information provided in the application submittal of October 14, 2001 and July 22, 2002.

Any revisions made to the underlying construction permits associated with this facility (formerly issued to Southdown, Inc.) in conjunction with the processing of this operating permit application have been reviewed in accordance with the requirements of Regulation No. 3, Part B, Construction Permits, and have been found to meet all applicable substantive and procedural requirements. This operating permit incorporates and shall be considered to be a combined construction/operating permit for any such revision, and the permittee shall be allowed to operate under the revised conditions upon issuance of this operating permit without applying for a revision to this permit or for an additional or revised Construction Permit.

**II. Source Description:**

This facility manufactures Portland Cement. The facility is located approximately 12 miles north of Boulder, near the town of Lyons. There are no affected states within 50 miles of the facility. Rocky Mountain National Park, Rawah Wilderness Area, and Eagle's Nest Wilderness Area are Federal Class I designated areas within 100 kilometers of the plant.

**III. Project Description**

In October of 2001, CEMEX proposed to move the location of the burner pipe at the feed shelf, in an attempt to improve the overall thermal efficiency of the calciner/kiln, and to allow the use of coal with lower heat content. Through this project CEMEX expected the change to result in a reduction in actual NO<sub>x</sub> emissions. It was expected the project could cause a slight increase in CO actual emissions. The Division evaluated the proposal as a Pollution Control Project (PCP) in accordance with EPA guidance and issued a revised permit reflecting expected emissions under the project. CEMEX moved the burner pipe and

concluded that the expected emission reductions would not occur. In the Technical Review Document for the PCP, the Division indicated that CEMEX proposed to revert back to the usual burner configuration if the change did not provide the anticipated NOx emission reduction. CEMEX therefore is proposing to revert to the previous configuration and permitted emission limits, as follows.

#### **Limited Emission changes**

	NOx TPY	CO TPY
Pre PCP Permit Limit	2,662.5	452.8
PCP Limit	1,900.00	260.0
Pre PCP 2-year actual average	2,160.4	163.8
Proposed Permit Limit	2,649.0	396.0

The proposed limits listed in the table above will be included in the operating permit. No increase in the production level will occur. The pre-PCP permitted emissions previously underwent all regulatory and ambient impact analyses.

#### **IV. Permit Processing Procedure**

The Division has determined that the modification to the operating permit to revert back to the pre-PCP emission limits qualifies as a minor permit modification. The Division considers this to be similar to a temporary clean coal technology project under the pollution prevention control project guidance. Under the PSD rules and guidance, cessation of temporary clean coal technology projects are exempt from the definition of “modification.” Note that the new proposed emission limits are less than the emission limits permitted prior to the pollution control project attempt.